

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE BIOPURE CORPORATION
SECURITIES LITIGATION

Civ. No. 03-12628 -NG

PLAINTIFF'S LOCAL RULE 16.1(D)(3) CERTIFICATION

The undersigned hereby certify that, pursuant to Local Rule 16.1(D)(3), they have conferred regarding a budget for the costs of conducting the full course, and alternative courses, of litigation; and to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

Dated: April 24, 2006

CO-LEAD COUNSEL FOR PLAINTIFF,

/s/ Howard T. Longman

Howard T. Longman (*pro hac vice*)
Stull, Stull & Brody
6 East 45th Street
New York, New York 10017
(212) 687-7230

LEAD PLAINTIFF,

/s/ Ronald Erickson

Ronald Erickson
c/o Howard Longman
Stull, Stull & Brody
6 East 45th Street
New York, New York 10017
(212) 687-7230